EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: Chapter 11

FTX TRADING LTD., et al., 1 Case No. 22-11068 (JTD)

Debtors. (Jointly Administered)

ALAMEDA RESEARCH LTD.,

Plaintiff,

- against -

Adv. Pro. No. 24-50188 (JTD)

FORIS DAX MT LTD., FORIS DAX ASIA PTE. LTD., FORIS DAX, INC., and IRON BLOCK CAPITAL,

Defendants.

THIRD STIPULATION FOR AN EXTENSION OF TIME FOR DEFENDANTS TO RESPOND TO COMPLAINT

Plaintiff Alameda Research Ltd. ("<u>Alameda</u>" or "<u>Plaintiff</u>") and Defendants Foris Dax MT Ltd., Foris DAX Asia Pte. Ltd., Foris DAX, Inc. and Iron Block Capital (collectively, the "<u>Defendants</u>" and, together with Alameda, the "<u>Parties</u>"), by and through their respective undersigned counsel, enter into this *Third Stipulation for an Extension of Time for Defendants to Respond to Complaint* (the "<u>Stipulation</u>") and hereby stipulate and agree as follows:

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX.

- 1. On November 7, 2024, Plaintiff initiated the above-captioned adversary proceeding by filing the Complaint for Turnover of Assets Pursuant to 11 U.S.C. § 542 and Disallowance of Claims Pursuant to 11 U.S.C. § 502 [Adv. D.I. 1] (the "Complaint").
- 2. On November 21, 2024, Foris Dax, Inc. and Iron Block Capital were served a *Summons and Notice of Pretrial Conference in an Adversary Proceeding* [Adv. D.I. 3-4]. All Defendants have agreed to accept service of the Complaint and waive their objections, if any, to service of process.
- 3. On December 19, 2024, the Parties stipulated to extend the Defendants' time to respond to the Complaint until January 21, 2025. [Adv. D.I. 5, 6].
- 4. On January 14, 2025, Plaintiff served *Plaintiff's First Set of Requests for Production of Documents* on certain Defendants, to which such Defendants responded on February 5, 2025.
- 5. On January 17, 2025, the Parties stipulated to extend the Defendants' time to respond to the Complaint until February 7, 2025. [Adv. D.I. 9].
- 6. The Parties have conferred regarding an agreement to further extend the Defendants' time to respond to the Complaint.
- 7. The Defendants' deadline to respond to the Complaint shall be extended through February 21, 2025.
- 8. This Stipulation is without prejudice to the rights of the Parties to seek a further extension and/or continuance as appropriate.
- 9. Except for defenses relating to service of process, the Defendants reserve all rights, claims, counterclaims and defenses.

Dated: February 6, 2025

LANDIS RATH & COBB LLP

/s/ Howard W. Robertson, IV

Adam G. Landis (No. 3407)

Richard S. Cobb (No. 3157)

Matthew B. McGuire (No. 4366)

Howard W. Robertson, IV (No. 6903)

919 Market Street, Suite 1800

Wilmington, DE 19801

Telephone: (302) 467-4400

E-mail: landis@lrclaw.com

cobb@lrclaw.com mcguire@lrclaw.com

robertson@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Stephanie G. Wheeler (admitted pro hac vice)

Brian D. Glueckstein (admitted pro hac vice)

Justin J. DeCamp (admitted pro hac vice)

Christopher J. Dunne (admitted pro hac vice)

Jacob M. Croke (admitted *pro hac vice*)

125 Broad Street

New York, NY 10004

Telephone: (212) 558-4000

Facsimile: (212) 558-3588

E-mail: wheelers@sullcrom.com

gluecksteinb@sullcrom.com

decampi@sullcrom.com

dunnec@sullcrom.com

crokej@sullcrom.com

Counsel to Plaintiff

K&L GATES LLP

/s/ Matthew B. Goeller

Steven L. Caponi (No. 3484)

Matthew B. Goeller (No. 6283)

600 N. King St., Suite 901

Wilmington, DE 19801

Telephone: (302) 416-7000

Email: steven.caponi@klgates.com

Email: matthew. goeller@klgates.com

-and-

Robert Honeywell (pro hac vice forthcoming)

599 Lexington Avenue

New York, NY 10022

Telephone: (212) 536-4863

E-mail: Robert.Honeywell@klgates.com

Counsel to the Defendants